

1 JAMES McMANIS (40958)  
2 ELIZABETH PIPKIN (243611)  
3 TYLER ATKINSON (257997)  
4 PRIYA SWAMINATHAN (349074)  
McMANIS FAULKNER  
a Professional Corporation  
50 West San Fernando Street, 10th Floor  
5 San Jose, California 95113  
6 Telephone: (408) 279-8700  
Facsimile: (408) 279-3244  
7 Email: epipkin@mcmanslaw.com  
tatkinson@mcmanslaw.com  
pswaminathan@mcmanslaw.com

9 *Attorneys for Defendant,*  
10 The Church of Jesus Christ of Latter-day Saints,  
A Utah Corporation sole

11 IN THE UNITED STATES DISTRICT COURT

12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

14 JANE DOE, an individual,

Case No.:

15 Plaintiff,

**NOTICE OF REMOVAL OF ACTION  
UNDER 28 U.S.C. §§ 1332, 1441 AND 1446**

16 vs.

17 THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS, INC., A UTAH  
18 CORPORATION SOLE; CRAIG ALLEN  
19 HARWARD, an individual; AND DOES 1-50,  
inclusive,

20 Defendants.

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1           **TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE**  
2 **NORTHERN DISTRICT OF CALIFORNIA:**

3           **PLEASE TAKE NOTICE** that pursuant to 28 U.S.C. §§ 1332, 1441, and 1446,  
4 Defendant, The Church of Jesus Christ of Latter-day Saints (the “Church”), files this Notice of  
5 Removal of the above-entitled action from the Superior Court of the State of California, County  
6 of Alameda. The Notice of Removal is based on the following grounds:

7           **The State Court Action**

8           1.       On or about July 9, 2024, Plaintiff JANE DOE (“Plaintiff”) filed a Complaint in  
9 the Superior Court of the State of California, County of Alameda. Attached hereto as **Exhibit A**,  
10 **B** and **C** are true and correct copies of the Summons, Complaint and Civil Cover Sheet.

11          2.       This civil action is currently pending in the Superior Court of Alameda County.

12          **Removal Based on Diversity Jurisdiction**

13          3.       Pursuant to 28 U.S.C. section 1332, removal is proper where diversity of citizenship  
14 exists and the amount in controversy exceeds \$75,000.

15          **Diversity of Citizenship Exists Between the Parties**

16          4.       Plaintiff is an individual domiciled in Santa Clara County, California. See **Exhibit**  
17 **B** at ¶ 3.

18          5.       Defendant CRAIG ALLEN HARWARD, is an individual domiciled in Utah. See  
19 **Exhibit G**.

20          6.       The Church, a Utah corporation sole, has its principal place of business in Salt Lake  
21 City, Utah. See **Exhibit B** at ¶ 7.

22          7.       For purposes of determining jurisdiction, a corporation “shall be deemed a citizen  
23 of every State and foreign state by which it has been incorporated and of the State or foreign state  
24 where it has its principal place of business.” 28 U.S.C. § 1332 (c)(1). It is irrelevant where the  
25 corporation is registered to do business. See *Tanious v. Gattoni*, 533 F.Supp.3d 770, 776-777  
26 (N.D. Cal. 2021) (finding that registration with the California Secretary of State does not make a  
27 business a citizen of California). Based on Plaintiff’s allegations in the Complaint for Damages,  
28 the Church is a Utah corporation.

8. Therefore, complete diversity exists between the parties.

### **The Amount in Controversy Exceeds \$75,000**

3       9. Plaintiff does not allege specific amounts of damages and penalties. However, it is  
4 plain that Plaintiff seeks over \$75,000 in damages and penalties. Plaintiff alleges that the Church  
5 is liable for childhood sexual abuse suffered at the hands of Defendant CRAIG ALLEN  
6 HARWARD and that because of the abuse, she requires compensation for lifelong medical  
7 treatment. See **Exhibit B** at ¶ 53. Assuming that Plaintiff has been expending sums of money for  
8 treatment since she was twelve years (12) years old, she is seeking reimbursement for treatment  
9 costs for the past twenty-four (24) years, in addition to treatment costs for the indefinite future.  
10 Based on the foregoing, it is more likely than not that Plaintiff is seeking to recover damages and  
11 other penalties exceeding \$75,000, exclusive of costs and interest.

12       10. In addition to lifelong medical care, Plaintiff also seeks indefinite “economic  
13 damages” based on a future inability to work in her profession. She contends that she “was injured  
14 and may be disabled in the future and thereby prevented from attending to the duties of her usual  
15 occupation.” See **Exhibit B** at ¶ 52. Thus, it is clear that Plaintiff is seeking more than \$75,000  
16 in damages.

17       11. When a defendant seeks federal-court adjudication, the defendant's amount-in-  
18 controversy allegation should be accepted when not contested by the plaintiff or questioned by the  
19 court. *Dart Cherokee Basin Operating Co. v. Owens*, 574 U.S. 81, 83 (2014). Where a complaint  
20 does not specify a particular amount of damages, the removing defendant's "notice of removal  
21 need include only a plausible allegation that the amount in controversy exceeds the jurisdictional  
22 threshold." *Id.* at 89. When meeting that threshold, the removing defendant need only show that  
23 it is "more likely than not" that the amount in controversy exceeds the jurisdictional minimum.  
24 See *Sanchez v. Monumental Life Ins. Co.* 102 F.3d 398, 404 (9th Cir. 1996). In establishing that  
25 the amount in controversy exceeds \$75,000, the defendant may rely on a chain of reasoning and  
26 underlying assumptions that are reasonable based on the complaint's allegations. *LaCross v.*  
27 *Knight Transp. Inc.*, 775 F.3d 1200, 1202 (9th Cir. 2015).

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1                   **Removal is Timely Made to the Proper Court by a Defendant**

2       12. On or about July 12, 2024, Plaintiff served the Summons and Complaint on the  
3 Church

4       13. As a defendant, the Church has the power to remove the case to this Court. *See* 28  
5 U.S.C. §§ 1441(a), 1446(a).

6       14. This Notice of Removal is timely because it is based on diversity of citizenship and  
7 it has been filed within 30 days of receipt of the Complaint by the Church. *See* 28 U.S.C. §  
8 1446(b)(1).

9       15. This Court is the proper Court for removal because the Superior Court of Alameda  
10 County is within the geographic boundaries of the Northern District of California. *See* 28 U.S.C.  
11 § 1441(a).

12                   **Non-Waiver of Defenses**

13       16. By removing this action from the Superior Court of the State of California, County  
14 of Alameda, the Church does not waive any defenses available to it.

15       17. By removing this action from the Superior Court of the State of California, County  
16 of Alameda, the Church does not admit any of the allegations in Plaintiff's Complaint.

17                   **Notice to Plaintiff**

18       18. Upon filing of this Notice of Removal, the Church will promptly give written notice  
19 to Plaintiff and will promptly file a copy of this Notice with the clerk of the Superior Court of the  
20 State of California, County of Alameda.

21       19. In compliance with 28 U.S.C. § 1446(a), true and correct copies of all "process,  
22 pleadings, and orders" served upon the Church in the action, or otherwise available on the state  
23 court docket are attached hereto as **Exhibits D - G**. Attached as **Exhibit H** is a true and correct  
24 copy of the docket report in the state court action.

25                   **Consent**

26       20. All co-defendants who have been properly joined and served with state court  
27 process have consented to this removal.

1 WHEREFORE, the Church respectfully requests that the above-entitled action now  
2 pending against it in the Superior Court of the State of California, County of Alameda, be removed  
3 to this Court.

4 DATED: August 9, 2024

5 McMANIS FAULKNER

6 /s/ *Elizabeth Pipkin*

7 ELIZABETH PIPKIN

8 Attorneys for Defendant,  
9 THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS

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# EXHIBIT A

SUM-100

# SUMMONS

## (CITACION JUDICIAL)

**NOTICE TO DEFENDANT:**  
**(AVISO AL DEMANDADO):**

THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole; CRAIG ALLEN HARWARD, an individual; and DOES 1 through 50, inclusive

**YOU ARE BEING SUED BY PLAINTIFF:**  
**(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

JANE DOE

**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.**

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es): Alameda Superior Court

24405 Amador Street, Hayward, CA 94544

CASE NUMBER:  
*(Número del Caso):*

24CV082728

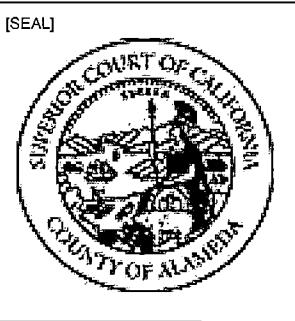
The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):  
 Meagan Verschueren, Esq., Singleton Schreiber LLP, 591 Camino de la Reina, Ste. 1025, San Diego, CA 92108; 619-771-3473

DATE: 07/09/2024 Clerk, by Chad Finke, Executive Officer / Clerk of the Court (Secretario) D. Franklin, Deputy (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



**NOTICE TO THE PERSON SERVED:** You are served

1.  as an individual defendant.
2.  as the person sued under the fictitious name of (specify):
3.  on behalf of (specify): **THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS**, a Utah Corporation sole  
 under:  CCP 416.10 (corporation)  CCP 416.60 (minor)  
 CCP 416.20 (defunct corporation)  CCP 416.70 (conservatee)  
 CCP 416.40 (association or partnership)  CCP 416.90 (authorized person)  
 other (specify):
4.  by personal delivery on (date):

## EXHIBIT B

1 Brett Schreiber, Esq. (SBN 239707)  
2 Meagan Verschueren, Esq. (SBN 313117)  
3 Katie Llamas, Esq. (SBN 303983)  
4 Singleton Schreiber, LLP  
5 591 Camino de la Reina, Ste. 1025  
6 San Diego, California 92108  
Tel: (619) 488-6699 Fax: (619) 488-6699  
bschreiber@singletonschreiber.com  
mverschueren@singletonschreiber.com  
kllamas@singletonschreiber.com

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ALAMEDA**

JANE DOE,

Plaintiff,

V.

THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS, a Utah  
Corporation sole; CRAIG ALLEN  
HARWARD, an individual;  
and DOES 1 through 50, inclusive,

## Defendants.

Case No.: 24CV082728

## **COMPLAINT FOR DAMAGES**

1. SEXUAL BATTERY;
  2. NEGLIGENCE;
  3. NEGLIGENT HIRING,  
SUPERVISION, AND RETENTION;
  4. NEGLIGENT SUPERVISION;
  5. NEGLIGENT FAILURE TO WARN,  
TRAIN, OR EDUCATE;
  6. BREACH OF FIDUCIARY DUTY;
  7. INTENTIONAL INFILCTION OF  
EMOTIONAL DISTRESS

**DEMAND FOR JURY TRIAL**

Plaintiff JANE DOE hereby complains and alleges as follows:

## PARTIES, JURISDICTION, AND VENUE

1. Venue in this case is based upon California Code of Civil Procedure Section 395, in that the events giving rise to Plaintiff's claims occurred in the County of Alameda, State of California and most conduct of Defendants which forms the basis of this action occurred in the County of Alameda, State of California.

2. All named entity defendants do business and conduct continuous and systematic activities in the State of California. All named entity defendants currently

1 operate, oversee, manage, own, control and profit from religious gatherings,  
 2 membership and entities in the County of Alameda, State of California, including the  
 3 subject Fremont California Stake of the Church of Jesus Christ of the Latter-Day Saints in  
 4 the City of Fremont, County of Alameda, State of California. Based upon information  
 5 and belief, at all relevant times and currently, all named defendants own real property in  
 6 the State of California. All defendants were conducting business in the State of  
 7 California when they harmed Plaintiff JANE DOE and most of the harm occurred at  
 8 property owned, managed and operated by Defendants in the County of Alameda, State  
 9 of California. As such, jurisdiction and venue are proper.

10 **A. PLAINTIFF JANE DOE**

11       3. At the time of filing this lawsuit, Plaintiff is an adult and resident of the County  
 12 of Santa Clara, State of California.

13       4. Plaintiff's full legal name is being withheld to protect her identity under her  
 14 California statutory and constitutional rights of privacy because this case involves  
 15 intimate facts of her sexual assault, battery and abuse and detailed facts of a sexual and  
 16 intimate nature. The sexual assault, battery and abuse occurred in approximately 2000  
 17 and 2001 when Plaintiff was about twelve (12) and thirteen (13) years old. As a victim of  
 18 childhood sexual assault, battery and abuse as defined by Code of Civil Procedure  
 19 section 340.1, Plaintiff proceeds under the pseudonym JANE DOE. Plaintiff is entitled to  
 20 protect her identity in this public court filing by not disclosing her name. *Doe v. Lincoln*  
 21 *Un. Sch. Dist. Doe* (2010) 188 Cal.App.4th 758.

22       5. This is an action to recover damages on behalf of an adult who was a victim of  
 23 childhood sexual assault, battery and abuse and it is governed by Code of Civil  
 24 Procedure section 340.11.

25       6. Under Code of Civil Procedure Section 340.11, this Complaint is timely because  
 26 Plaintiff is under forty (40) years old and this is an action for the recovery of damages  
 27 suffered as a result of childhood sexual abuse, assault, and battery.

1           **B. DEFENDANTS**

2           7. Defendant THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS  
 3 (hereinafter "LDS Corporation"), also commonly known as the "LDS Church" or  
 4 "Mormon Church," is a Utah for-profit corporation that holds itself out to be a religious  
 5 organization that gives back to its people. In reality, it is a company that has enormous  
 6 profits yearly and hold investments worth billions of dollars.

7           8. It is estimated that LDS Corporation and its businesses own over 16,000 United  
 8 States properties, including hundreds of multimillion-dollar suburban parcels,  
 9 commercial towers, religious sites and large farmlands. This includes a large piece of  
 10 land where the subject incidents occurred in Fremont, California, that based upon  
 11 information and belief, is worth more than \$8,000,000.00.

12           9. Based upon information and belief, at relevant times, LDS Corporation has and  
 13 does own several businesses including but not limited to insurance companies,  
 14 investment companies, radio stations, television stations, news and newspaper  
 15 companies, cattle ranches, the park, water sewage companies, a high-end mall, and real  
 16 estate companies. Based upon information and belief, LDS Corporation has leadership  
 17 with ownership and/or it has ownership interest in major airlines.

18           10. LDS does business as (1) Corporation of the Presiding Bishop of the Church of  
 19 Jesus Christ of Latter-Day Saints; (2) Millennial Star Network; (3) Vernon Utah  
 20 Livestock; (4) Mortgage Loan Service; (7) Salt Lake Mormon Tabernacle Choir; (8) Farm  
 21 Management Company; (9) Deseret Transportation; (10) Latter-Day Saint Philanthropies;  
 22 (11) Beehive Clothing; (12) Deseret Industries; (13) Tabernacle Choir at Temple Square;  
 23 (14) Deseret Soap; (15) Elberta Valley AG; (16) Mormon Tabernacle Choir; (17) Deseret  
 24 Pasta; (18) Joseph Smith Memorial Building; (19) LDS Philanthropies; (20) The Church of  
 25 Jesus Christ of Latter-Day Saints; and (21) Latter-Day Saint Humanitarian Center.

26           11. In or around 2021, CORPORATION OF THE PRESIDENT OF THE CHURCH  
 27 OF JESUS CHRIST OF LATTER-DAY SAINTS, LDS Corporation's global operating  
 28 company, merged with LDS Corporation. LDS Corporation has merged with several of

1 its entities over the years.

2       12. LDS holds nominal title and owns, manages and controls the real property  
 3 associated with "the church," LDS Corporation, throughout the United States and the  
 4 world. This includes the LDS Corporation meetinghouses and "houses of worship,"  
 5 including but not limited to real property in the State of California and County of  
 6 Alameda. LDS has numerous contacts with the State of California, including but not  
 7 limited to, holding and applying for several permits in and around the State of  
 8 California. Additionally, LDS Corporation oversees and operates multiple subsidiary  
 9 corporations on behalf of the "church" throughout California. LDS Corporation  
 10 conducts business in the State of California and has systemic activities in the State of  
 11 California. LDS Corporation's headquarters is located at 50 East North Temple Street,  
 12 Salt Lake City, Utah 84510.

13       13. LDS Corporation does not provide information about their finances to the  
 14 public in the United States with rare exception, but it generates income from its  
 15 businesses in the State of California. Worldwide, disclosures and studies estimate that  
 16 LDS profits at least several billions of dollars annually. Based upon information and  
 17 belief, LDS Corporation owns hundreds of billions of dollars in stocks, real property,  
 18 business profits, and business assets. Based upon information and belief, LDS  
 19 Corporation bought and gained stock, in part, through investing tithing money received  
 20 from its members.

21       14. LDS Corporation is registered to do business in the State of California, and the  
 22 presiding Bishop in each area, ward or stake throughout California serves at the pleasure  
 23 of and subject to the direct and absolute control of "the church," LDS Corporation. LDS  
 24 Corporation owns and operates a large number of "houses of worship" or  
 25 "meetinghouses" in the State of California and controls the leaders, employees and  
 26 workers at each, including but not limited to the Bishops and Bishop Secretaries.

27       15. The Bishops are appointed to control each ward by the LDS Corporation and  
 28 subject to their control. The Bishop of the ward is often referred to as the "father" or

1 "caretaker" of the ward, responsible for the wellbeing of all of the members of the ward.  
 2 The Bishops and other leaders at the wards (the "Bishopric") vet and select one or two  
 3 "Bishop Secretaries" or "Executive Secretaries" per Ward. The Bishop Secretary works  
 4 closely with the Bishop and other leaders. They have several responsibilities including  
 5 directing communications between the members and the Bishopric; forwarding  
 6 messages received from employees and volunteers to appropriate leaders; keeping lists  
 7 of members and details about each member; helping with seminary and institute  
 8 matters; helping members register for classes; helping members with access to church  
 9 services and offerings; scheduling interviews for youth and adults who need to renew  
 10 their "temple recommends;" scheduling appointments with the Bishopric; serves as a  
 11 members of the Ward Council; attends Ward Council meetings; complete assignments  
 12 given by the Bishopric; meet with the Bishopric and prepare agendas for meetings; and  
 13 work closely with members to ensure operations in the best interest of "the church," LDS  
 14 Corporation.

15       16. Defendant CRAIG ALLEN HARWARD is an individual that was a resident of  
 16 the State of California at the time of the subject sexual abuse, assault and battery  
 17 described herein. Based upon information and belief, Defendant CRAIG ALLEN  
 18 HARWARD currently owns real property in the State of California. However,  
 19 investigation shows that CRAIG ALLEN HARWARD likely currently resides in either  
 20 the City of Saint George, State of Utah or the City of San Jose, State of California. At all  
 21 times relevant, Defendant CRAIG ALLEN HARWARD was a Bishop Secretary at the  
 22 subject Church of Jesus Christ of Latter-Day Saints located at 48950 Green Valley Road,  
 23 Fremont, California 94539, which was owned and operated by LDS Corporation. At all  
 24 times relevant, Defendant CRAIG ALLEN HARWARD was serving and acting as an  
 25 agent of LDS CORPORATION.

26       17. At all times relevant herein, LDS Corporation, Defendant HARWARD and  
 27 DOES 1 through 50 assumed responsibility for the wellbeing of the LDS Corporation's  
 28 members, including but not limited to children and "church students" including

1 Plaintiff. Defendants, and each of them, held out their leaders, executive employees and  
 2 council members, including Defendant HARWARD, as their agents who were placed by  
 3 the LDS Corporation and DOES 1 to 50 in positions of authority and responsibility over  
 4 members of the congregation, including, but not limited to, Plaintiff. As such, LDS  
 5 Corporation, Defendant HARWARD and DOES 1 to 50 had a special relationship with  
 6 members of their congregation, including but not limited to, Plaintiff. This relationship  
 7 gave rise to a duty to protect members of the congregation, and more specifically, minor  
 8 members of the congregation, including, but not limited to, Plaintiff, from foreseeable  
 9 risks of harm. At all times alleged herein, Defendants and DOES 1 through 50 assumed  
 10 special responsibilities toward their members in order to protect said members, and  
 11 more specifically, minor members, including but not limited to, Plaintiff, from sexual  
 12 predators, sexual abuse, and any and all abuse, especially abuse from its executive  
 13 leadership and council members. Defendants and DOES 1 through 50 also had a duty to  
 14 protect people from abuse and harm at their subject property in Fremont, California.

15       18. LDS Corporation's income comes from member tithes which is turned over to  
 16 the "Church" for investment and other uses, including support of the administrative  
 17 expenditures of the LDS Corporation and its wards, stakes and areas. Plaintiff is  
 18 informed, believes, and based thereon alleges that the LDS Corporation receives at least  
 19 approximately five to seven (5-7) billion dollars per year from member tithe, which  
 20 involves members being asked to donate 10% or more of their income to LDS  
 21 Corporation. It has been reported publicly in the media that LDS Corporation owns  
 22 financial assets and real estate in excess of \$100 billion.

23       19. The true names, identities, or capacities, whether individual, associate,  
 24 successor-in-interest to, corporate, or otherwise, of Defendants DOES 1 through 50, are  
 25 unknown to Plaintiff. Plaintiff therefore sues said Defendants by such fictitious names.  
 26 When the true names, identities, or capacities of such fictitiously designated Defendants  
 27 are ascertained, Plaintiff will ask leave of this Court to amend this complaint to assert  
 28 their true names, identities, and capacities, together with the proper charging

1 allegations.

2       20. Each of the Defendants designated herein as a DOE is responsible, in some  
 3 manner, for the events and happenings herein, thereby legally causing the injuries and  
 4 damages to Plaintiff as more thoroughly alleged below.

5       21. Plaintiff is informed and believes and based thereon alleges that, at all times  
 6 mentioned herein, each Defendant was the agent, representative, and/or employee of  
 7 each other Defendant. In doing the wrongful acts and inactions hereinafter alleged, each  
 8 Defendant was acting within the course and scope of said alternative personality,  
 9 capacity, identity, agency, representation, and/or employment with each other  
 10 defendant and were within the scope of their authority, whether actual or apparent. At  
 11 all times relevant, Defendant LDS Corporation and DOES 1 through 50, knew or should  
 12 have known about Defendant HARWARD's sexual harassment, sexual abuse, rape, and  
 13 wrongful conduct at and off of Defendant LDS Corporation and DOES 1 through 50's  
 14 property and recklessly retained him in a leadership position and tried to cover up  
 15 reports of abuse, placing hundreds of youth at risk. Defendants LDS Corporation and  
 16 DOES 1 through 50, and each of them, thereby ratified Defendant HARWARD's  
 17 wrongful actions. Defendants LDS Corporation and DOES 1 through 50 are therefore  
 18 vicariously liable for the actions of Defendant HARWARD and the remaining DOES.

19       22. Plaintiff is informed and believes and based thereon alleges that, at all times  
 20 mentioned herein, Defendants were the trustees, partners, servants, joint venturers,  
 21 shareholders, contractors, or employees of each other Defendant and the acts and  
 22 omissions herein alleged were done by them, acting individually through such capacity,  
 23 within the course and scope of their authority in each position, with the permission and  
 24 consent of each other Defendant, at the direction of each other defendant, and whose  
 25 conduct was thereafter ratified by each other Defendant. Accordingly, each of them is  
 26 jointly and severally liable to Plaintiff.

27       23. Wherever appearing in this Complaint, each reference to "Defendants" shall  
 28 be deemed to include all Defendants, including all fictitiously named defendants.

1                   FACTUAL ALLEGATIONS

2                  24. From approximately 1959 through 2001, Defendant LDS Corporation and  
 3 DOES 1 through 50 knew that many of its members were being sexually abused by its  
 4 leaders, employees and agents. Based upon information and belief, there were more  
 5 than one-hundred and eighty-four (184) official reports and/or accusations related to  
 6 sexual abuse by LDS Corporation leaders by 2001. Based upon information and belief,  
 7 several other reports were made to the church but were never made public due to LDS  
 8 Corporation covering it up.

9                  25. Since 2001, more than one-hundred and fifty (150) LDS Corporation leaders  
 10 and members have been accused of sexually abusing children. Almost all accused were  
 11 alleged to have multiple victims.

12                 26. Beginning in or around the year 2000 and continuing through 2001, Plaintiff,  
 13 who was approximately twelve (12) to thirteen (13) years old, was the victim of  
 14 childhood sexual misconduct, assault, battery, molestation, harassment and abuse.  
 15 Plaintiff attended bible class at the Church of Jesus Christ of Latter-Day Saints located at  
 16 48950 Green Valley Road, Fremont, CA 94539 ("LDS' Property") including but not  
 17 limited to in approximately 2000 and 2001.

18                 27. In approximately 2000 and 2001, at the times Plaintiff was sexually abused,  
 19 Defendant CRAIG ALLEN HARWARD served as Secretary to the Bishop at LDS  
 20 Corporation and was under the direct supervision, agency, and control of Defendants  
 21 LDS Corporation and DOES 1 through 50. As part of its ministry, Defendants LDS  
 22 Corporation and DOES 1 through 50 appoint Church Elders, High Priests, Bishopric  
 23 Members, Single Adult Leaders, Spiritual Advisors, Executive Members, Youth  
 24 Counselors, Religious Leaders, mentors, agents, and supervisors to educate and minister  
 25 to families, including their children. Defendant LDS Corporation and DOES 1 through 50  
 26 appointed Defendant CRAIG ALLEN HARWARD and gave him authority to act on its  
 27 behalf and to assert control over its members.

28                 28. In or around 2000 and 2001, Defendant CRAIG ALLEN HARWARD publicly

1 showed inappropriate affection to Plaintiff at LDS' Property at the general big  
 2 congregation in front of all local leaders appointed by LDS Corporation. Defendant  
 3 HARWARD often sat by Plaintiff and touched Plaintiff's thighs and shoulders. Every  
 4 time Defendant HARWARD came to sit by or walk with Plaintiff, Plaintiff soon learned  
 5 and expected that Defendant HARWARD would touch Plaintiff's body each time. It  
 6 became a regular occurrence. Based upon information and belief, Defendant  
 7 HARWARD did this to other church students at LDS' Property around the same time.

8       29. In or around 2000 and 2001, Defendant HARWARD regularly walked with  
 9 Plaintiff to classes and inappropriately touched Plaintiff's shoulders.

10      30. In or around 2000 and 2001, Defendant HARWARD would repeatedly take  
 11 Plaintiff out of bible class at LDS' Property several times per month to sexually abuse her  
 12 and the class leader would allow it. Defendant HARWARD would open the classroom  
 13 door, ask for Plaintiff to come with him, and the LDS Corporation leader leading the  
 14 class would allow it without question despite Plaintiff seeming more and more hesitant  
 15 each time. The class leader would tell Plaintiff to go and that "it's okay you will be right  
 16 back." No one ever asked Plaintiff why she didn't want to go. Plaintiff reluctantly went  
 17 and felt forced to go. Plaintiff soon knew that each time she was called to leave the  
 18 classroom by Defendant HARWARD, he was going to take her to another room to  
 19 engage in sexual acts. Plaintiff was told not to tell anyone and was afraid to speak out at  
 20 the time. The LDS Corporation, its class leader, as well as other church leaders, knew or  
 21 should have known what was going on but allowed it to happen despite that  
 22 knowledge.

23      31. In or around 2000 and 2001, while Plaintiff was in Defendant LDS' custodial  
 24 care and under their control and apparent asserted authority, Defendant HARWARD  
 25 would repeatedly and regularly take Plaintiff out of bible class at LDS' Property and  
 26 bring her to a smaller room or bathroom and touch Plaintiff on her genitals and private  
 27 parts. Defendant HARWARD would also force Plaintiff to fondle Defendant  
 28 HARWARD's penis and perform oral sex on him regularly.

1       32. In or around 2000 and 2001, during ongoing sexual abuse of Plaintiff at LDS'  
2 Property, Defendant HARWARD would grope Plaintiff's genitals, touch his own penis  
3 and then force Plaintiff to touch Defendant HARWARD's penis too. Defendant  
4 HARWARD would put his penis in Plaintiff's mouth, which was painful. Defendant  
5 HARWARD similarly sexually abused other children around the same time period.

6       33. In and around 2000 and 2001, Defendant HARWARD often escorted Plaintiff  
7 and her family to their vehicle when many people were outside of the church, including  
8 church/LDS Corporation leaders, and Defendant HARWARD would quickly grope  
9 Plaintiff's body on the way.

10      34. While Plaintiff was in Defendant LDS Corporation and DOES 1 through 50's  
11 custodial care and under their control during bible class at the subject LDS' Property,  
12 LDS Corporation and DOES 1 - 50 recklessly and negligently allowed Plaintiff to be  
13 alone with Defendant HARWARD and sexually abused on multiple occasions. While  
14 Plaintiff was in Defendant LDS Corporation and DOES 1 through 50's custodial care and  
15 under their control, LDS Corporation knowingly allowed Defendant HARWARD to  
16 sexually harass Plaintiff and touch Plaintiff's body inappropriately in front of LDS  
17 Corporation leaders and members.

18      35. At all times relevant, LDS Corporation and DOES 1 to 50 failed to supervise  
19 the children in its care, including Plaintiff, and failed to enact, implement, and follow  
20 reasonable policies or procedures for supervision of children in their custodial care and  
21 under their asserted authority, including Plaintiff; and LDS Corporation and DOES 1  
22 through 50's failure to exercise reasonable care in the supervision of the children during  
23 bible class, enabled Harward to repeatedly sexually abuse Plaintiff.

24      36. In or around 2000 and 2001, and before that time period, Defendants LDS  
25 Corporation and DOES 1 through 50, were notified of Defendant HARWARD's  
26 propensity to abuse children through visual observation of his sexual harassment of  
27 children and through reports of sexual misconduct. In response to visual observations  
28 and reports, Defendants LDS Corporation and DOES 1 through 50 did not go to the

1 police or take any action to protect Plaintiff or other abused children. LDS Corporation  
 2 and DOES 1 through 50 failed to protect, prevent, or stop the known and/or likely and  
 3 foreseeable sexual abuse of children at its subject property, LDS' Property, for years. As  
 4 a result, several children were sexually abused by Defendant HARWARD while he was  
 5 acting in the course and scope of his agency and/or employment and under the consent,  
 6 authority, and on behalf of LDS Corporation and DOES 1 through 50.

7       37. In or around 2000 and 2001, a church group of all of the women church  
 8 members would meet off of the church premises two to three times per month and  
 9 Defendant HARWARD would volunteer to watch some of the children for the  
 10 church/LDS Corporation, including Plaintiff, and he would take Plaintiff back to his  
 11 house until the church women were done with the church activity. While at Defendant  
 12 HARWARD's house, on nearly every occasion that he watched Plaintiff related to the  
 13 church activities, Defendant HARWARD would sexually touch Plaintiff and/or force  
 14 Plaintiff to engage in sexual acts, including anal penetration during which Defendant  
 15 HARWARD would insert his penis into Plaintiff's anus. The anal penetration and oral  
 16 sexual acts were painful and caused Plaintiff pain and discomfort.

17       38. In or around 2000 and 2001, LDS Corporation and DOES 1 through 50 would  
 18 have camping and/or scout trips in which it would take children camping and to do  
 19 various activities. On at least two occasions while on a LDS Corporation and DOES 1  
 20 through 50 camping trip, Defendant HARWARD, while acting within the course and  
 21 scope of his agency and in his position of authority with LDS Corporation, sexually  
 22 abused, assaulted and battered Plaintiff.

23       39. During all periods and acts of sexual harassment, abuse, assault and battery  
 24 described above, Defendant HARWARD was acting within the course and scope of his  
 25 employment and/or agency with LDS Corporation and DOES 1 through 50, under the  
 26 color of authority given to him by LDS Corporation and DOES 1 through 50, and with  
 27 the consent, knowledge and ratification of LDS Corporation and DOES 1 through 50.

28       40. Defendant CRAIG ALLEN HARWARD has been accused of sexually abusing

at least ten (10) children.

41. In 2004, Defendant CRAIG ALLEN HARWARD pleaded guilty to charges relating to sexual abuse of four children over a six-year period while he was the Bishop Secretary for LDS Corporation. He was sentenced in Santa Clara County Superior Court to 14 years in prison for the lewd and lascivious acts on four children.

42. At all relevant times described above, Defendants LDS Corporation and DOES 1 through 50 knowingly allowed and gave Defendant CRAIG ALLEN HARWARD the authority, location, means, ratification, and access to children to sexually abuse children, including but not limited to Plaintiff, at its property and off-site events.

## FIRST CAUSE OF ACTION

## **Sexual Battery**

(Against All Defendants and DOES 1 through 50)

43. Plaintiff hereby incorporates by reference all prior allegations as if fully set forth herein.

44. In or about 2000 and 2001, while Plaintiff was at Defendants LDS Corporation and DOES 1 through 50's property and under the custodial care of Defendants, Defendant CRAIG ALLEN HARWARD, an adult male, intentionally touched, groped, and fondled Plaintiff's private parts and genitals and put his penis into Plaintiff's mouth on several occasions, all without her consent and while Plaintiff was a minor of approximately twelve (12) and thirteen (13) years old.

45. At all relevant times described above, Defendant CRAIG ALLEN HARWARD's conduct was intentional and sexually offensive, and included sexual and offensive contact with Plaintiff's body, constituting sexual battery under California Civil Code section 1708.5.

46. At all relevant times described above, Defendant CRAIG ALLEN HARWARD knew that Plaintiff was a minor and unable to consent to sexual touching and/or sexual acts.

47. At all relevant times, Defendant CRAIG ALLEN HARWARD was working

1 and acting within the course and scope of his employment and/or agency, including the  
 2 managerial and supervisory authoritative role granted to him, with Defendants LDS  
 3 Corporation and DOES 1 through 50, and each of them, when he committed the  
 4 wrongful sexually offensive contact with Plaintiff.

5       48. At all relevant times, Defendant CRAIG ALLEN HARWARD was acting  
 6 under the authority granted to him by Defendants LDS Corporation and DOES 1  
 7 through 50, and each of them, and holding himself out as acting on behalf of, and acting  
 8 on behalf of, Defendants LDS Corporation and DOES 1 through 50 when he committed  
 9 the wrongful sexually offensive contact with Plaintiff such that his acts were the acts of  
 10 the LDS Corporation at the time of the wrongful sexually offensive contacts.

11       49. At all relevant times, Defendant CRAIG ALLEN HARWARD was acting with  
 12 the knowledge, consent and ratification of Defendants LDS Corporation and DOES 1  
 13 through 50, and each of them, when he committed the wrongful sexually offensive  
 14 contact with Plaintiff.

15       50. At all relevant times and before the sexual assault and battery of Plaintiff,  
 16 Defendants knew or should have known that Defendant CRAIG ALLEN HARWARD  
 17 would sexually assault and batter children; and Defendants knew or should have known  
 18 that Defendant CRAIG ALLEN HARWARD had sexually assaulted and battered  
 19 children at the subject LDS' Property and at LDS events before and that he had sexually  
 20 violent propensities and would likely harm someone, especially children, if given the  
 21 opportunity.

22       51. As a direct, proximate and legal result of the wrongful acts and omissions of  
 23 the Defendants, and each of them, described above, Plaintiff was injured in her health,  
 24 strength and activity, sustaining physical, mental and nervous pain and suffering, and  
 25 severe shock to her health and person, all to her general damages in a sum which will be  
 26 shown according to proof.

27       52. As a direct, proximate and legal result of the wrongful acts and omissions of  
 28 the Defendants, and each of them, described above, Plaintiff was injured and may be

disabled in the future and thereby prevented from attending to the duties of her usual occupation. As a result, Plaintiff has suffered economic damages in an amount to be proven at trial.

53. As a direct, proximate and legal result of the wrongful acts and omissions of the defendants, and each of them, Plaintiff required and will require medical care, medical treatment, life care, and other incidental expenses and will likely incur additional like expenses in the future, all in amounts presently unknown to her. Plaintiff therefore asks leave of court either to amend this Complaint so as to show the amount of her medical and life care expenses, when ascertained, or to prove the amount at the time of trial.

54. In committing the wrongful and egregious acts described herein, Defendant CRAIG ALLEN HARWARD acted with malice, oppression and fraud, justifying an award of punitive damages against Defendant CRAIG ALLEN HARWARD.

## **SECOND CAUSE OF ACTION**

## Negligence

**(Against All Defendants and DOES 1 through 50)**

55. Plaintiff hereby incorporates by reference all prior allegations as if fully set forth herein.

56. In 2000 and 2001 and at all relevant times, Defendants and DOES 1 through 50 had a duty to supervise the children at their property that were participating in their activities and whom were under their custodial care, including but not limited to, Plaintiff. They had a duty to have in place and enforce those rules and regulations necessary for the protection of the children in their care. Defendants and DOES 1 through 50 had a special relationship with plaintiff and thus owed plaintiff a protective duty of care to keep children who participated in its activities safe, which duty included an affirmative duty to protect children lawfully on the subject premises and attending the bible classes, along with at its church-sponsored and organized events.

57. Defendants LDS Corporation and DOES 1 through 50 had a further duty to

1 provide proper oversight and supervision to avoid such abusive conduct as that which  
 2 befell Plaintiff and other minor children at the hands of Defendant CRAIG ALLEN  
 3 HARWARD, who was enabled in perpetrating said abuse by and through the negligence  
 4 of the Defendants LDS Corporation and DOES 1 through 50.

5       58. At the time of the child sexual harassment and abuse incidents described  
 6 herein, Defendants and each of them owed Plaintiff a duty of care to use reasonable care  
 7 to avoid injury to others including Plaintiff and a duty to provide services that were free  
 8 from sexual, offensive, or inappropriate touching and contact.

9       59. In or about 2000 and 2001, Defendants breached their duty of care to Plaintiff  
 10 while Plaintiff was at Defendants LDS Corporation and DOES 1 through 50's property  
 11 and while Plaintiff was attending Defendants' events and under the custodial care of  
 12 Defendants, Defendant CRAIG ALLEN HARWARD, an agent acting on behalf of all  
 13 other Defendants, intentionally touched, groped, and fondled Plaintiff's private parts  
 14 and genitals and put his penis into Plaintiff's mouth on several occasions, all without her  
 15 consent and while Plaintiff was a minor of approximately twelve (12) and thirteen (13)  
 16 years old.

17       60. At all relevant times described above, Defendants knew or should have  
 18 known that Defendant CRAIG ALLEN HARWARD's conduct was harmful, negligent,  
 19 inappropriate, egregious, offensive, sexually offensive and grossly negligent and that  
 20 such conduct had a substantial likelihood of causing harm to Plaintiff.

21       61. At all relevant times described above, Defendants knew that Plaintiff was a  
 22 minor and unable to consent to sexual touching and/or sexual acts.

23       62. At all relevant times, Defendant CRAIG ALLEN HARWARD was working  
 24 and acting within the course and scope of his employment and/or agency, including the  
 25 leadership, managerial and supervisory authoritative role granted to him, with  
 26 Defendants LDS Corporation and DOES 1 through 50, and each of them, when he  
 27 committed the wrongful sexually offensive contact with Plaintiff.

28       63. At all relevant times, Defendant CRAIG ALLEN HARWARD was acting

1 under the authority granted to him by Defendants LDS Corporation and DOES 1  
 2 through 50, and each of them, and holding himself out as acting on behalf of, and acting  
 3 on behalf of, Defendants LDS Corporation and DOES 1 through 50 when he committed  
 4 the wrongful sexually offensive contact with Plaintiff such that his acts were the acts of  
 5 the LDS Corporation at the time of the wrongful sexually offensive contacts.

6 64. At all relevant times, Defendant CRAIG ALLEN HARWARD was acting with  
 7 the knowledge, consent and ratification of Defendants LDS Corporation and DOES 1  
 8 through 50, and each of them, when he committed the wrongful sexually offensive  
 9 contact with Plaintiff.

10 65. At all relevant times and before the sexual assault and battery of Plaintiff,  
 11 Defendants knew or should have known that Defendant CRAIG ALLEN HARWARD  
 12 would sexually assault and batter children; and Defendants knew or should have known  
 13 that Defendant CRAIG ALLEN HARWARD had sexually assaulted and battered  
 14 children at the subject LDS' Property and at LDS events before and that he had sexually  
 15 violent propensities and would likely harm someone, especially children, if given the  
 16 opportunity.

17 66. At all relevant times, Defendants LDS Corporation and DOES 1 through 50,  
 18 and each of them, knew or with reasonable diligence should have known about  
 19 Defendant CRAIG ALLEN HARWARD's propensity and history of sexually harming  
 20 children.

21 67. Despite knowing and having notice of Defendant CRAIG ALLEN  
 22 HARWARD's past wrongful conduct and propensity to engage in sexual abuse of  
 23 children, Defendants LDS Corporation and DOES 1 through 50 chose not to discipline  
 24 Defendant HARWARD, to ratify his conduct, and to retain Defendant HARWARD as a  
 25 leader and representative of the LDS Corporation and their agent, knowingly subjecting  
 26 persons of all ages, and especially children, including Plaintiff, to the real risk that  
 27 Defendant HARWARD would sexually harm them, thereby ratifying and adopting the  
 28 misconduct of Defendant HARWARD as its own conduct.

1       68. Based upon information and belief, Defendants made a conscious reckless and  
2 knowing decision not to report or warn about prior sexual abuse and signs of sexual  
3 abuse by Defendant CRAIG ALLEN HARWARD to parents or the police and instead  
4 engaged in a cover-up operation to protect Defendant HARWARD, which was grossly  
5 negligent and reckless.

6       69. While engaging in the above wrongful acts and omissions, Defendants were  
7 grossly negligent and Defendants, and each of their, gross negligence was a direct,  
8 proximate, and legal result of Plaintiff's harms and losses described above and below.

9       70. As a direct, proximate and legal result of the gross negligence and carelessness  
10 of the Defendants, and each of them, described above, Plaintiff was injured in her health,  
11 strength and activity, sustaining physical, mental and nervous pain and suffering, and  
12 severe shock to her health and person, all to her general damages in a sum which will be  
13 shown according to proof.

14       71. As a direct, proximate and legal result of the gross negligence and carelessness  
15 of the Defendants, and each of them, described above, Plaintiff was injured and may be  
16 disabled in the future and thereby prevented from attending to the duties of her usual  
17 occupation. As a result, Plaintiff has suffered economic damages in an amount to be  
18 proven at trial.

19       72. As a direct, proximate and legal result of the gross negligence and carelessness  
20 of the defendants, and each of them, Plaintiff required and will require medical care,  
21 medical treatment, life care, and other incidental expenses and will likely incur  
22 additional like expenses in the future, all in amounts presently unknown to her. Plaintiff  
23 therefore asks leave of court either to amend this Complaint so as to show the amount of  
24 her medical and life care expenses, when ascertained, or to prove the amount at the time  
25 of trial.

26       73. In committing the wrongful and egregious acts described herein, Defendants  
27 CRAIG ALLEN HARWARD and LDS Corporation acted with malice, oppression and  
28 fraud, justifying an award of punitive damages against Defendants CRAIG ALLEN

HARWARD and LDS Corporation.

### **THIRD CAUSE OF ACTION**

## Negligent Hiring, Supervision, and Retention

(Against Defendants THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS and DOES 1 through 50)

74. Plaintiff hereby incorporates by reference all prior allegations as if fully set forth herein.

75. At all times herein mentioned the Defendants LDS Corporation and DOES 1 to 50 owed plaintiff a protective duty of care to keep the children, including Plaintiff, safe while they were in defendants' custodial care. Said duty includes the duty to protect children from sexual assaults by other agents, employees, and volunteers of LDS Corporation and DOES 1 through 50, or other members of the church and to reasonably, adequately, and with due care, properly hire, supervise, and retain the people, volunteers, agents and employees who were providing the services to the children.

76. At all times relevant, Defendants had a duty and obligation to adequately and properly investigate the background, fitness, and competence of its employees, agents, volunteers, leaders, and those acting on its behalf, including Defendant CRAIG ALLEN HARWARD, before hiring and before and during retaining them as employees, agents, volunteers or as someone to act on their behalf. Defendants had a duty to use reasonable care in the hiring, supervision and retention of its employees, agents, volunteers, independent contractors, leaders, executive team members, and those it permitted to act on its behalf.

77. Defendants LDS Corporation and DOES 1 through 50, inclusive and each of them, negligently and carelessly, employed, supervised, hired, trained, controlled, screened, sponsored, directed, oversaw, managed, and retained its employees, agents, servants, volunteers or independent contractors, including Defendant HARWARD, and failed to investigate the skill, competence, dangerous propensities, background, ability and prior conduct of HARWARD, to determine whether he was fit and competent to

1 perform his job duties as a Bishop Secretary or Executive Secretary in a safe and  
 2 reasonable manner.

3       78. Defendants LDS Corporation and DOES 1 through 50, inclusive and each of  
 4 them, failed to properly and adequately investigate and vet Defendant HARWARD as  
 5 an employee, agent, independent contractor, volunteer, leader, executive secretary,  
 6 and/or someone to act on its behalf before hiring him.

7       79. Had Defendants LDS Corporation and DOES 1 through 50 properly and  
 8 adequately vetted and investigated Defendant HARWARD's background, dangerous  
 9 propensities, fitness and competence, they would have discovered that he was unfit and  
 10 incompetent to be in the position they gave him with access to and control over children  
 11 at the church/LDS Corporation.

12       80. Plaintiff is informed and believes, and thereon alleges, that in addition to his  
 13 assault against Plaintiff in 2000 and 2001, Defendant HARWARD committed sexual  
 14 assault and battery of multiple other children in 1997 through 2003 while in his position  
 15 as the Bishop Secretary of LDS Corporation.

16       81. Plaintiff is informed and believes, and thereon alleges, that at least one other  
 17 child reported a sexual assault and battery by Defendant HARWARD to Defendants  
 18 LDS Corporation and its local leaders before Plaintiff was sexually assaulted and  
 19 battered. During the times when Defendant HARWARD was sexually abusing Plaintiff,  
 20 Defendants were able to see and watch Defendant HARWARD grope Plaintiff in public  
 21 and regularly allowed him to take Plaintiff to rooms alone without explanation or any  
 22 oversight or supervision whatsoever in reckless disregard for Plaintiff's wellbeing.

23       82. Plaintiff is informed and believes, and thereon alleges, that after at least one  
 24 other person reported a sexual assault and battery at the LDS Property and after LDS  
 25 saw the signs of abuse by Defendant HARWARD, and while knowing that sexual abuse  
 26 by its leaders was a pervasive and disgusting problem that permeated its company,  
 27 Defendants dismissed the complaint carelessly and grossly negligently retained its  
 28 Bishop Secretary, HARWARD, instead of terminating his employment or properly

1 investigating the serious acts and complaint(s).

2       83. At all times relevant, Defendants LDS Corporation and DOES 1 through 50  
 3 knew and should have known that Defendant HARWARD had already sexually  
 4 assaulted and abused other children and was concurrently sexually abusing other  
 5 children at its subject LDS' Property, yet Defendants did nothing to prevent the harm  
 6 and sexual assault and battery of Plaintiff while she was under their custodial control,  
 7 custody and watch.

8       84. Despite having warning and notice of Defendant HARWARD's violent,  
 9 unstable, inappropriate and offensive nature and behavior, Defendants LDS Corporation  
 10 and DOES 1 through 50, left Defendant HARWARD in a position of power and authority  
 11 over vulnerable children, including Plaintiff.

12       85. Despite having warning and notice of Defendant HARWARD's predatorial,  
 13 inappropriate and offensive nature and behavior, Defendants LDS Corporation and  
 14 DOES 1 through 50, knowingly left Defendant HARWARD in an unsupervised, closed  
 15 room and environment to sexually assault Plaintiff on numerous occasions at its LDS'  
 16 Property.

17       86. As a direct and proximate result of the above negligence of the Defendants  
 18 LDS Corporation and DOES 1 through 50, Defendant HARWARD sexually harassed and  
 19 sexually assaulted and battered Plaintiff.

20       87. At all times relevant, Defendants LDS Corporation and DOES 1 through 50  
 21 had a duty to ensure the safety of their members while at their property and under their  
 22 control, especially and including the children that they assumed the care for while  
 23 conducting classes and other events and activities, by enacting and enforcing policies,  
 24 procedures, adequate training, accountability, reporting measures, and other safety  
 25 measures for their agents, employees and volunteers to follow when dealing and  
 26 interacting with children and for children to be able to report and be safe and free from  
 27 harm, harassment and sexual abuse while at their property and/or under their control.

28       88. Defendants LDS Corporation and DOES 1 through 50 also had a duty to take

1 disciplinary actions against any employee, agent, volunteer, leader or persons acting on  
 2 its behalf, including but not limited to Defendant HARWARD, who engaged in  
 3 misconduct designed to harm or injure children at their property or under their control;  
 4 and not to retain such employees, agents, volunteers, leaders or other persons that did  
 5 engage in such misconduct and wrongful acts.

6       89. Defendants LDS Corporation and DOES 1 through 50 breached their duties to  
 7 Plaintiff including but not limited to failing to adequately train its volunteers,  
 8 employees, agents and those it put in leadership roles, including Defendant  
 9 HARWARD, in working in and around children in vulnerable situations; failing to enact  
 10 and enforce reasonable safety policies and procedures for its employees and agents who  
 11 interacted with children; failing to adequately and safely monitor and supervise its  
 12 employees and agents including Defendant HARWARD's conduct with children to  
 13 ensure that he was not acting inappropriately, dangerously or in such a way to cause  
 14 harm to children; failing to heed warnings and reports of Defendant HARWARD's  
 15 inappropriate and sexually suggestive behavior and sexual misconduct; and failing to  
 16 take disciplinary action against its employees and agents, including HARWARD, who  
 17 engaged in wrongful acts and behavior.

18       90. At all times relevant, Defendants LDS Corporation and DOES 1 through 50,  
 19 knew or should have known that Defendant HARWARD's background and prior and  
 20 concurrent wrongful acts and omissions, as well as his inappropriate behavior with  
 21 children, rendered him unfit to be hired as a Secretary Bishop who would interact alone  
 22 with children and assert control over them; that the employee and agent training of  
 23 Defendants LDS Corporation and DOES 1 through 50 was insufficient, inadequate, and  
 24 unreasonable to prevent harm to children, including Plaintiff; that the policies and  
 25 procedures of Defendants LDS Corporation and DOES 1 through 50 were inadequate  
 26 and insufficient to ensure the safety of children; and/or that its policies and procedures  
 27 were not being enforced; and that Defendant HARWARD engaged in inappropriate and  
 28 unlawful sexual conduct with children before Plaintiff.

91. As a direct, proximate and legal result of the gross negligence and carelessness of the Defendants, and each of them, described above, Plaintiff was injured in her health, strength and activity, sustaining physical, mental and nervous pain and suffering, and severe shock to her health and person, all to her general damages in a sum which will be shown according to proof.

92. As a direct, proximate and legal result of the gross negligence and carelessness of the Defendants, and each of them, described above, Plaintiff was injured and may be disabled in the future and thereby prevented from attending to the duties of her usual occupation. As a result, Plaintiff has suffered economic damages in an amount to be proven at trial.

93. As a direct, proximate and legal result of the gross negligence and carelessness of the defendants, and each of them, Plaintiff required and will require medical care, medical treatment, life care, and other incidental expenses and will likely incur additional like expenses in the future, all in amounts presently unknown to her. Plaintiff therefore asks leave of court either to amend this Complaint so as to show the amount of her medical and life care expenses, when ascertained, or to prove the amount at the time of trial.

94. In committing the wrongful and egregious acts described herein, Defendants CRAIG ALLEN HARWARD and LDS Corporation acted with malice, oppression and fraud, justifying an award of punitive damages against Defendants CRAIG ALLEN HARWARD and LDS Corporation.

## **FOURTH CAUSE OF ACTION**

## Negligent Supervision

(Against Defendants THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS and DOES 1 through 50)

95. Plaintiff hereby incorporates by reference all prior allegations as if fully set forth herein.

96. At all times herein mentioned the Defendants LDS Corporation and DOES 1 to

1       50 owed plaintiff a protective duty of care to keep the children, including Plaintiff, safe  
 2 while they were in defendants' custodial care. Said duty includes the duty to protect  
 3 children from sexual assaults by other agents, employees, and volunteers of LDS  
 4 Corporation and DOES 1 through 50, or other members of the church and to reasonably,  
 5 adequately, and with due care, properly hire, supervise, and retain the people,  
 6 volunteers, agents and employees who were providing the services to the children.

7       97. At all relevant times, Defendants LDS Corporation and DOES 1 through 50  
 8 failed to enact, implement, and follow a system or procedure to reasonably supervise the  
 9 children in their care, including, but not limited to, Plaintiff, to prevent sexual  
 10 molestation, battery, assault, and abuse of children, including, but not limited to,  
 11 Plaintiff.

12       98. Defendants LDS Corporation and DOES 1 to 50 were, or should have been,  
 13 aware of how vulnerable young children were to sexual molestation, battery, assault,  
 14 and abuse within the LDS Corporation and DOES 1 through 50's classes, activities,  
 15 programs, and/or clubs for minors. LDS Corporation and DOES 1 through 50 had  
 16 decades worth of notice of pervasive sexual abuse and child molestation that occurred at  
 17 its properties and by its members and leadership. LDS Corporation and DOES 1  
 18 through 50 had notice of Defendant HARWARD's dangerous and predatory  
 19 propensities before and while he was harming Plaintiff but failed to supervise Plaintiff  
 20 and instead facilitated and harbored Defendant HARWARD in his sexual abuse of  
 21 Plaintiff at their property and during their events.

22       99. As a direct, proximate and legal result of the gross negligence and negligent  
 23 supervision of the Defendants, and each of them, described above, Plaintiff was injured  
 24 in her health, strength and activity, sustaining physical, mental and nervous pain and  
 25 suffering, and severe shock to her health and person, all to her general damages in a sum  
 26 which will be shown according to proof.

27       100. As a direct, proximate and legal result of the gross negligence and negligent  
 28 supervision of the Defendants, and each of them, described above, Plaintiff was injured

and may be disabled in the future and thereby prevented from attending to the duties of her usual occupation. As a result, Plaintiff has suffered economic damages in an amount to be proven at trial.

101. As a direct, proximate and legal result of the gross negligence and negligent supervision of the defendants, and each of them, Plaintiff required and will require medical care, medical treatment, life care, and other incidental expenses and will likely incur additional like expenses in the future, all in amounts presently unknown to her. Plaintiff therefore asks leave of court either to amend this Complaint so as to show the amount of her medical and life care expenses, when ascertained, or to prove the amount at the time of trial.

## **FIFTH CAUSE OF ACTION**

## **Negligent Failure to Warn, Train, or Educate**

(Against Defendants THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS and DOES 1 through 50)

102. Plaintiff hereby incorporates by reference all prior allegations as if fully set forth herein.

103. At all times relevant herein, Defendants LDS Corporation and DOES 1 through 50 owed Plaintiff a duty to take reasonable measures and use reasonable care to protect Plaintiff from the risk, and avoid causing the risk of abuse and other tortious conduct by properly warning, training, and/or educating Plaintiff, other minor children within the subject ward's community including other victims, and their parents and guardians within the subject ward's community about how to avoid such risk.

104. Before and at the times of the abuse alleged herein, Defendants LDS Corporation and DOES 1 to 50 breached their duty to take reasonable measures and to use reasonable care to protect Plaintiff from and avoid causing the risk of abuse and other tortious conduct by and through its failure to properly warn, train, and/or educate Plaintiff, other minor children within the subject ward's community, and their parents and guardians within the subject ward's community about how to avoid such a risk

1 This includes how and when to say no, limitations on authority, policies and procedures  
 2 against sexual acts and sexual abuse, reporting procedures, accountability procedures, a  
 3 buddy system, security and other measures that should have been taken and taught.

4       105. At all times relevant, Defendants LDS Corporation and DOES 1 through 50  
 5 breached their duty to take reasonable measures and to use reasonable care to protect  
 6 Plaintiff from the risk of childhood sexual molestation, battery, assault, abuse, and other  
 7 tortious conduct while Plaintiff was at its property and/or events by failing to warn,  
 8 train, and/or educate Plaintiff or her parents about how to avoid such a risk.

9       106. At all times relevant, Defendants LDS Corporation and DOES 1 through 50  
 10 breached their duty to take reasonable measures to protect Plaintiff from and to use  
 11 reasonable care to avoid the risk of childhood sexual molestation, battery, assault, abuse,  
 12 and other tortious conduct by its agents and leadership by failing to supervise  
 13 Defendant CRAIG ALLEN HARWARD and stop him from committing wrongful sexual  
 14 acts with minor children, including, but not limited to, Plaintiff in the face of signs, facts  
 15 and reports of the same that were known or knowable to Defendants.

16       107. Because Plaintiff was a minor at the time of the sexual misconduct  
 17 perpetrated against her by Defendant CRAIG ALLEN HARWARD, Plaintiff was unable  
 18 to give free or voluntary consent to the sexual acts perpetrated against her. Reasonable  
 19 care required Defendants to take affirmative acts to protect children in their care,  
 20 custody and/or control, including Plaintiff. However, Defendants failed to take any  
 21 actions to protect children or Plaintiff.

22       108. As a direct, proximate and legal result of the negligence of the Defendants,  
 23 and each of them, described above, Plaintiff was injured in her health, strength and  
 24 activity, sustaining physical, mental and nervous pain and suffering, and severe shock to  
 25 her health and person, all to her general damages in a sum which will be shown  
 26 according to proof.

27       109. As a direct, proximate and legal result of the negligence of the Defendants,  
 28 and each of them, described above, Plaintiff was injured and may be disabled in the

1 future and thereby prevented from attending to the duties of her usual occupation. As a  
 2 result, Plaintiff has suffered economic damages in an amount to be proven at trial.  
 3

4       110. As a direct, proximate and legal result of the negligence of the defendants,  
 5 and each of them, Plaintiff required and will require medical care, medical treatment, life  
 6 care, and other incidental expenses and will likely incur additional like expenses in the  
 7 future, all in amounts presently unknown to her. Plaintiff therefore asks leave of court  
 8 either to amend this Complaint so as to show the amount of her medical and life care  
 9 expenses, when ascertained, or to prove the amount at the time of trial.

#### SIXTH CAUSE OF ACTION

##### Breach of Fiduciary Duty

###### (Against All Defendants and DOES 1 through 50)

111. Plaintiff hereby incorporates by reference all prior allegations as if fully set  
 forth herein.

112. At all times relevant, Defendants and DOES 1 through 50 were in a fiduciary  
 relationship with Plaintiff, owing her a special duty of due care. All Defendants are and  
 were mandated reporters with respect to claims of child abuse and child safety.

113. Defendants and DOES 1 through 50 owed the Plaintiff a statutory, common  
 law, and constitutional duty to protect her and guarantee her safety while on the subject  
 premises and while engaged in the subject ward's bible class and activities, and to  
 protect her from dangers of which said Defendants knew or, in the exercise of reasonable  
 care, should have known, including, but not limited to, the danger posed by Defendant  
 CRAIG ALLEN HARWARD to young children, including, but not limited to, Plaintiff.

114. Defendants and DOES 1 through 50 breached their fiduciary duty to Plaintiff  
 by failing to properly supervise CRAIG ALLEN HARWARD and take appropriate steps  
 to prevent the lewd and lascivious conduct perpetrated by him against Plaintiff.  
 Defendants and DOES 1 through 50 also failed to implement or follow reasonable or  
 appropriate policies and procedures to protect Plaintiff.

115. As a direct, proximate and legal result of the Defendants' breach of fiduciary

duty to Plaintiff, and each of theirs, described above, Plaintiff was injured in her health, strength and activity, sustaining physical, mental and nervous pain and suffering, and severe shock to her health and person, all to her general damages in a sum which will be shown according to proof.

116. As a direct, proximate and legal result of the Defendants' breach of fiduciary duty to Plaintiff, and each of theirs, described above, Plaintiff was injured and may be disabled in the future and thereby prevented from attending to the duties of her usual occupation. As a result, Plaintiff has suffered economic damages in an amount to be proven at trial.

117. As a direct, proximate and legal result of the Defendants' breach of fiduciary duty to Plaintiff, and each of theirs, Plaintiff required and will require medical care, medical treatment, life care, and other incidental expenses and will likely incur additional like expenses in the future, all in amounts presently unknown to her. Plaintiff therefore asks leave of court either to amend this Complaint so as to show the amount of her medical and life care expenses, when ascertained, or to prove the amount at the time of trial.

## **SEVENTH CAUSE OF ACTION**

## **Intentional Infliction of Emotional Distress**

(Against Defendant CRAIG ALLEN HARWARD and DOES 1 through 50)

118. Plaintiff re-alleges and incorporates herein by reference each and every allegation in the preceding paragraphs.

119. In committing the acts and course of conduct described hereinabove, Defendant HARWARD and DOES 1 through 50, and each of them, acted outrageously and deliberately and with the intent to cause, or with reckless disregard of the probability of causing Plaintiff to suffer severe and ongoing emotional distress, embarrassment humiliation, and mental anguish. Defendant HARWARD and DOES 1 through 50, and each of them, were aware that Plaintiff was relying upon him, and each of them, to refrain from subjecting her to such abusive and agonizing behavior.

Defendant HARWARD and DOES 1 through 50, and each of them, were further aware that engaging in such abusive and agonizing behavior would cause Plaintiff to suffer severe and ongoing emotional distress, humiliation, and mental anguish. As such, the acts and course of conduct committed by Defendant HARWARD and DOES 1 through 50, and each of them, as described hereinabove, constituted Intentional Infliction of Emotional Distress against Plaintiff.

120. As a direct and legal result of the wrongful acts of Defendant HARWARD and DOES 1 through 50 and in intentionally inflicting emotional distress, Defendants caused Plaintiff to suffer severe shock and severe emotional distress in addition to injuries including but not limited to severe physical and mental pain and suffering, physical injuries, past and future costs of medical care and treatment, and past and future loss of earnings and earning capacity, in an amount not yet ascertained, but which exceeds the minimum jurisdictional limits of this Court.

121. In committing the acts described above, Defendant CRAIG ALLEN HARWARD acted with malice, oppression, and fraud, justifying an award of punitive damages against Defendant HARWARD.

## PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays for judgment against Defendants, and each of them, and the following relief as follows:

1. For general and compensatory damages in an amount according to proof at trial;
  2. For special damages in an amount according to proof at trial;
  3. For costs of litigation and expert costs;
  4. For punitive damages against Defendant CRAIG ALLEN HARWARD as to

Causes of Action One through Three and Seven only;

5. For punitive damages against Defendant THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS ("LDS Corporation") as to Causes of Action Two and Three only;

6. For interest and prejudgment interest at the legal rate of 10%; and,
7. For such other and further relief as the court deems proper and just under all the circumstances.

**DEMAND FOR JURY TRIAL**

NOTICE IS HEREBY GIVEN that Plaintiff hereby demands trial by jury in the above-captioned matter.

Dated: July 9, 2024

## SINGLETON SCHREIBER, LLP

By:

*Roger Hahn*

Brett Schreiber, Esq.  
Meagan Verschueren, Esq.  
Katie Llamas, Esq.  
Attorneys for Plaintiff

**SINGLETON SCHREIBER, LLP**  
5951 Camino de la Reina, Suite 1025 | San Diego, CA 92108  
[www.singletonschreiber.com](http://www.singletonschreiber.com)

# EXHIBIT C

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Brett Schreiber, Esq. (SBN 239707) / Meagan Verschueren, Esq. (SBN 313117) Singleton Schreiber LLP, 591 Camino de la Reina, Ste. 1025, San Diego, CA 92108		FOR COURT USE ONLY	
TELEPHONE NO.: 619-771-3473	FAX NO.:	<b>ELECTRONICALLY FILED</b> Superior Court of California, County of Alameda <b>07/09/2024 at 11:42:46 AM</b> By: Damaree Franklin, Deputy Clerk	
EMAIL ADDRESS:			
ATTORNEY FOR (Name): Plaintiff Jane Doe			
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA</b> STREET ADDRESS: 24405 Amador Street MAILING ADDRESS: 24405 Amador Street CITY AND ZIP CODE: Hayward, CA 94544 BRANCHNAME: Hayward Hall of Justice			
CASE NAME: Jane Doe v The Church of Jesus Christ of Latter-Day Saints, et al.			
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> Unlimited <input type="checkbox"/> Limited (Amount demanded exceeds \$35,000)      (Amount demanded is \$35,000 or less)		<b>Complex Case Designation</b> <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: <b>24CV082728</b>
		JUDGE: DEPT.:	

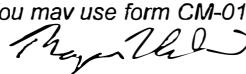
*Items 1–6 below must be completed (see instructions on page 2).*

1. Check one box below for the case type that best describes this case:	Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input checked="" type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)			Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)			Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)		
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2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- a.  Large number of separately represented parties
  - b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
  - c.  Substantial amount of documentary evidence
  - d.  Large number of witnesses
  - e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
  - f.  Substantial postjudgment judicial supervision
3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive
4. Number of causes of action (specify): 7-Sexual Battery, Negligence, Negligent Hiring, Negligent Supervision, Breach of Fiduciary
5. This case  is  is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: July 9, 2024

Meagan Verschueren, Esq.



(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

**INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET****CM-010**

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

**CASE TYPES AND EXAMPLES**

<b>Auto Tort</b>	Breach of Contract/Warranty (06)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)</b>
Auto (22)–Personal Injury/Property Damage/Wrongful Death Uninsured Motorist (46) ( <i>if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto</i> )	Breach of Rental/Lease Contract ( <i>not unlawful detainer or wrongful eviction</i> ) Contract/Warranty Breach–Seller Plaintiff ( <i>not fraud or negligence</i> ) Negligent Breach of Contract/ Warranty Other Breach of Contract/Warranty	Antitrust/Trade Regulation (03) Construction Defect (10) Claims Involving Mass Tort (40) Securities Litigation (28) Environmental/Toxic Tort (30) Insurance Coverage Claims ( <i>arising from provisionally complex case type listed above</i> ) (41)
<b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b>	Collections (e.g., money owed, open book accounts) (09) Collection Case–Seller Plaintiff Other Promissory Note/Collections Case	<b>Enforcement of Judgment</b>
Asbestos (04) Asbestos Property Damage Asbestos Personal Injury/ Wrongful Death Product Liability ( <i>not asbestos or toxic/environmental</i> ) (24) Medical Malpractice (45) Medical Malpractice– Physicians & Surgeons Other Professional Health Care Malpractice	Insurance Coverage ( <i>not provisionally complex</i> ) (18) Auto Subrogation Other Coverage Other Contract (37) Contractual Fraud Other Contract Dispute	Enforcement of Judgment (20) Abstract of Judgment (Out of County) Confession of Judgment ( <i>non-domestic relations</i> ) Sister State Judgment Administrative Agency Award ( <i>not unpaid taxes</i> ) Petition/Certification of Entry of Judgment on Unpaid Taxes Other Enforcement of Judgment Case
Other PI/PD/WD (23) Premises Liability (e.g., slip and fall) Intentional Bodily Injury/PD/WD (e.g., assault, vandalism) Intentional Infliction of Emotional Distress Negligent Infliction of Emotional Distress Other PI/PD/WD	Eminent Domain/Inverse Condemnation (14) Wrongful Eviction (33) Other Real Property (e.g., quiet title) (26) Writ of Possession of Real Property Mortgage Foreclosure Quiet Title Other Real Property ( <i>not eminent domain, landlord/tenant, or foreclosure</i> )	<b>Miscellaneous Civil Complaint</b>
<b>Non-PI/PD/WD (Other) Tort</b>	<b>Unlawful Detainer</b>	RICO (27) Other Complaint ( <i>not specified above</i> ) (42) Declaratory Relief Only Injunctive Relief Only ( <i>non-harassment</i> ) Mechanics Lien Other Commercial Complaint Case ( <i>non-tort/non-complex</i> ) Other Civil Complaint ( <i>non-tort/non-complex</i> )
Business Tort/Unfair Business Practice (07) Civil Rights (e.g., discrimination, false arrest) ( <i>not civil harassment</i> ) (08) Defamation (e.g., slander, libel) (13) Fraud (16) Intellectual Property (19) Professional Negligence (25) Legal Malpractice Other Professional Malpractice ( <i>not medical or legal</i> ) Other Non-PI/PD/WD Tort (35)	Commercial (31) Residential (32) Drugs (38) ( <i>if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential</i> )	<b>Miscellaneous Civil Petition</b>
<b>Employment</b>	<b>Judicial Review</b>	Partnership and Corporate Governance (21) Other Petition ( <i>not specified above</i> ) (43) Civil Harassment Workplace Violence Elder/Dependent Adult Abuse Election Contest Petition for Name Change Petition for Relief From Late Claim Other Civil Petition
Wrongful Termination (36) Other Employment (15)	Asset Forfeiture (05) Petition Re: Arbitration Award (11) Writ of Mandate (02) Writ–Administrative Mandamus Writ–Mandamus on Limited Court Case Matter Writ–Other Limited Court Case Review Other Judicial Review (39) Review of Health Officer Order Notice of Appeal–Labor Commissioner Appeals	

*Unified Rules of the Superior Court of California, County of Alameda*

## F. ADDENDUM TO CIVIL CASE COVER SHEET

Case Number:

Short Title:  
Jane Doe v The Church of Jesus Christ of Latter-Day Saints, et al.

## CIVIL CASE COVER SHEET ADDENDUM

THIS FORM IS REQUIRED IN ALL NEW UNLIMITED CIVIL CASE FILINGS IN THE  
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA

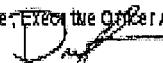
[ X ] Hayward Hall of Justice (447)

[ ] Oakland, Rene C. Davidson Alameda County Courthouse (446)

[ ] Pleasanton, Gale-Schenone Hall of Justice (448)

Civil Case Cover Sheet Category	Civil Case Cover Sheet Case Type	Alameda County Case Type (check only one)	
Auto Tort	Auto tort (22)	[ ] 34	Auto tort (G) Is this an uninsured motorist case? [ ] yes [ ] no
Other PI /PD / WD Tort	Asbestos (04) Product liability (24) Medical malpractice (45) Other PI/PD/WD tort (23)	[ ] 75 [ ] 89 [ ] 97 [ X ] 33	Asbestos (D) Product liability (not asbestos or toxic tort/environmental) (G) Medical malpractice (G) Other PI/PD/WD tort (G)
Non - PI /PD / WD Tort	Bus tort / unfair bus. practice (07) Civil rights (08) Defamation (13) Fraud (16) Intellectual property (19) Professional negligence (25) Other non-PI/PD/WD tort (35)	[ ] 79 [ ] 80 [ ] 84 [ ] 24 [ ] 87 [ ] 59 [ ] 03	Bus tort / unfair bus. practice (G) Civil rights (G) Defamation (G) Fraud (G) Intellectual property (G) Professional negligence - non-medical (G) Other non-PI/PD/WD tort (G)
Employment	Wrongful termination (36) Other employment (15)	[ ] 38 [ ] 85 [ ] 53 [ ] 54	Wrongful termination (G) Other employment (G) Labor comm award confirmation Notice of appeal - L.C.A.
Contract	Breach contract / Wrnty (06) Collections (09) Insurance coverage (18) Other contract (37)	[ ] 04 [ ] 81 [ ] 86 [ ] 98	Breach contract / Wrnty (G) Collections (G) Ins. coverage - non-complex (G) Other contract (G)
Real Property	Eminent domain / Inv Cdm (14) Wrongful eviction (33) Other real property (26)	[ ] 18 [ ] 17 [ ] 36	Eminent domain / Inv Cdm (G) Wrongful eviction (G) Other real property (G)
Unlawful Detainer	Commercial (31) Residential (32) Drugs (38)	[ ] 94 [ ] 47 [ ] 21	Unlawful Detainer - commercial Unlawful Detainer - residential Unlawful detainer - drugs
Judicial Review	Asset forfeiture (05) Petition re: arbitration award (11) Writ of Mandate (02) Other judicial review (39)	[ ] 41 [ ] 62 [ ] 49 [ ] 64	Asset forfeiture Pet. re: arbitration award Writ of mandate Is this a CEQA action (Publ.Res.Code section 21000 et seq) [ ] Yes [ ] No Other judicial review
Provisionally Complex	Antitrust / Trade regulation (03) Construction defect (10) Claims involving mass tort (40) Securities litigation (28) Toxic tort / Environmental (30) Ins covrg from cmplx case type (41)	[ ] 77 [ ] 82 [ ] 78 [ ] 91 [ ] 93 [ ] 95	Antitrust / Trade regulation Construction defect Claims involving mass tort Securities litigation Toxic tort / Environmental Ins covrg from complex case type
Enforcement of Judgment	Enforcement of judgment (20)	[ ] 19 [ ] 08	Enforcement of judgment Confession of judgment
Misc Complaint	RICO (27) Partnership / Corp. governance (21) Other complaint (42)	[ ] 90 [ ] 88 [ ] 68	RICO (G) Partnership / Corp. governance (G) All other complaints (G)
Misc. Civil Petition	Other petition (43)	[ ] 06 [ ] 69	Change of name Other petition

# EXHIBIT D

<b>SUPERIOR COURT OF CALIFORNIA COUNTY OF ALAMEDA</b>		Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Rene C. Davidson Courthouse Administration Building, 1221 Oak Street, Oakland, CA 94612		<b>FILED</b> Superior Court of California County of Alameda 07/09/2024 Clerk Flike, Exec the Officer/Clerk of the Court By:  Deputy D. Franklin
PLAINTIFF: Jane Doe	DEFENDANT: THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a l	CASE NUMBER: 24CV082728
<b>NOTICE OF CASE MANAGEMENT CONFERENCE</b>		

TO THE PLAINTIFF(S)/ATTORNEY(S) FOR PLAINTIFF(S) OF RECORD:

You are ordered to serve all named defendants and file proofs of service on those defendants with the court within 60 days of the filing of the complaint (Cal. Rules of Court, 3.110(b)).

Give notice of this conference to all other parties and file proof of service.

Your Case Management Conference has been scheduled on:

Date: 12/04/2024	Time: 3:00 PM	Dept: 25
Location: Rene C. Davidson Courthouse Administration Building, 1221 Oak Street, Oakland, CA 94612		

TO DEFENDANT(S)/ATTORNEY(S) FOR DEFENDANT(S) OF RECORD:

The setting of the Case Management Conference does not exempt the defendant from filing a responsive pleading as required by law, you must respond as stated on the summons.

TO ALL PARTIES who have appeared before the date of the conference must:

Pursuant to California Rules of Court, 3.725, a completed Case Management Statement (Judicial Council form CM-110) must be filed and served at least 15 calendar days before the Case Management Conference. The Case Management Statement may be filed jointly by all parties/attorneys of record or individually by each party/attorney of record.

**Meet and confer**, in person or by telephone as required by Cal. Rules of Court, rule 3.724.

**Post jury fees** as required by Code of Civil Procedure section 631.

If you do not follow the orders above, the court may issue an order to show cause why you should not be sanctioned under Cal. Rules of Court, rule 2.30. Sanctions may include monetary sanctions, striking pleadings or dismissal of the action.

The judge may place a Tentative Case Management Order in your case's on-line register of actions before the conference. This order may establish a discovery schedule, set a trial date or refer the case to Alternate Dispute Resolution, such as mediation or arbitration. Check the court's eCourt Public Portal for each assigned department's procedures regarding tentative case management orders at <https://eportal.alameda.courts.ca.gov>.

# EXHIBIT E

<b>SUPERIOR COURT OF CALIFORNIA COUNTY OF ALAMEDA</b>		Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Rene C. Davidson Courthouse Administration Building, 1221 Oak Street, Oakland, CA 94612		<b>FILED</b> Superior Court of California County of Alameda 07/09/2024  By: <u>D. Franklin</u> Deputy D. Franklin
PLAINTIFF(S): Jane Doe		
DEFENDANT(S): THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation		
<b>NOTICE OF CASE ASSIGNMENT</b>		
		CASE NUMBER: <b>24CV082728</b>

**THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Rule 3.734 of the California Rules of Court and Title 3 Chapter 2 of the Local Rules of the Superior Court of California, County of Alameda, this action is hereby assigned by the Presiding Judge for all purposes to:

ASSIGNED JUDGE: Jenna Whitman

DEPARTMENT: 25

LOCATION: Rene C. Davidson Courthouse  
Administration Building, 1221 Oak Street, Oakland, CA 94612

PHONE NUMBER: (510) 267-6941

FAX NUMBER:

EMAIL ADDRESS: Dept25@alameda.courts.ca.gov

Under direct calendaring, this case is assigned to a single judge for all purposes including trial.

Please note: In this case, any challenge pursuant to Code of Civil Procedures section 170.6 must be exercised within the time period by law. (See Code of Civ. Proc. §§ 170.6, subd. (a.)(2) and 101.3)

**NOTICE OF NONAVAILABILITY OF COURT REPORTERS:** Effective June 4, 2012, the court will not provide a court reporter for civil law and motion hearings, any other hearing or trial in civil departments, or any afternoon hearing in Department 201 (probate). Parties may arrange and pay for the attendance of a certified shorthand reporter. In limited jurisdiction cases, parties may request electronic recording. Amended Local Rule 3.95 states: "Except as otherwise required by law, in general civil case and probate departments, the services of an official court reporter are not normally available. For civil trials, each party must serve and file a statement before the trial date indicating whether the party requests the presence of an official court reporter."

**GENERAL PROCEDURES**

Following assignment of a civil case to a specific department, all pleadings, papers, forms, documents and writings can be submitted for filing at either Civil Clerk's Office, located at the Rene C. Davidson Courthouse, Room 109, 1225 Fallon Street, Oakland, California, 94612, and the Hayward Hall of Justice, 24405 Amador Street, Hayward, California, 94544 and through Civil e-filing. Information regarding Civil e-filing can be found on the courts website. All documents, with the exception of the original summons and the original civil complaint, shall have clearly typed on the face page of each document, under the case number, the following:

**NOTICE OF CASE ASSIGNMENT**

<b>SUPERIOR COURT OF CALIFORNIA COUNTY OF ALAMEDA</b>		Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Rene C. Davidson Courthouse 1225 Fallon Street, Oakland, CA 94612		<b>FILED</b> Superior Court of California County of Alameda 07/09/2024 Chad Finke, Executive Officer/Clerk of the Court By:  D. Franklin Deputy
PLAINTIFF/PETITIONER: Jane Doe		
DEFENDANT/RESPONDENT: THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole et al		
<b>CERTIFICATE OF MAILING</b>		CASE NUMBER: 24CV082728

I, the below-named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the attached document upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States mail at the courthouse in Oakland, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

Meagan Verschueren  
Singleton Schreiber, LLP  
591 Camino de la Reina, Ste. 1025  
San Diego, CA 92108

Chad Finke, Executive Officer / Clerk of the Court

Dated: 07/09/2024

By:



D. Franklin, Deputy Clerk

**CERTIFICATE OF MAILING**

**ASSIGNED FOR ALL PURPOSES TO  
JUDGE Jenna Whitman  
DEPARTMENT 25**

All parties are expected to know and comply with the Local Rules of this Court, which are available on the court's website at [http://www.alameda.courts.ca.gov/Pages.aspx/Local-Rules\(1\)](http://www.alameda.courts.ca.gov/Pages.aspx/Local-Rules(1)) and with the California Rules of Court, which are available at [www.courtinfo.ca.gov](http://www.courtinfo.ca.gov).

Parties must meet and confer to discuss the effective use of mediation or other alternative dispute processed (ADR) prior to the Initial Case Management Conference. The court encourages parties to file a "Stipulation to Attend ADR and Delay Initial Case Management Conference for 90 Days." The court's website contains this form and other ADR information. If the parties do not stipulate to attend ADR, the parties must be prepared to discuss referral to ADR at the Initial Case Management Conference.

#### COURT RESERVATIONS

The use of the Court Reservation System (CRS) is now mandated in many civil courtrooms within the Alameda County Superior Court. Instead of calling or emailing the courtroom to make a reservation, parties with a case assigned to a courtroom using CRS are directed to utilize CRS to make and manage their own reservations, within parameters set by the courtrooms. CRS is available 24 hours a day, seven days a week and reservations can be made from a computer or smart phone. Please note, you are prohibited from reserving more than one hearing date for the same motion.

Prior to scheduling any motion on CRS, including any Applications for Orders for Appearance and Examination, or continuing any motion, please review the online information (if any) for the courtroom in which you are reserving. There may be specific and important conditions associated with certain motions and proceedings. Information is available on the court's eCourt Public Portal at [www.eportal.alameda.courts.ca.gov](http://www.eportal.alameda.courts.ca.gov).

Chad Finke, Executive Officer / Clerk of the Court



By

D. Franklin, Deputy Clerk

# EXHIBIT F

<p><i>Attorney or Party without Attorney:</i>            Brett Schreiber, Esq. (SBN 239707)            SINGLETON SCHREIBER, LLP            591 Camino de la Reina, Suite 1025            San Diego, CA 92108            Telephone No: 619-356-7602            Attorney For: Plaintiff</p>	<p><i>For Court Use Only</i></p>								
<p><b>ELECTRONICALLY FILED</b>            Superior Court of California,            County of Alameda  <b>07/16/2024 at 04:35:25 PM</b></p>									
<p>By: Camie Thao,            Deputy Clerk</p>									
<p><i>Insert name of Court, and Judicial District and Branch Court:</i>            ALAMEDA COUNTY SUPERIOR COURT</p> <p><i>Plaintiff:</i> JANE DOE  <i>Defendant:</i> THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole, et al.</p>									
<p><b>PROOF OF SERVICE SUMMONS</b></p>	<table border="1"> <tr> <td data-bbox="478 582 796 646"><i>Hearing Date:</i></td> <td data-bbox="796 582 861 646"><i>Time:</i></td> <td data-bbox="861 582 1016 646"><i>Dept/Div:</i></td> <td data-bbox="1016 582 1237 646"><i>Case Number:</i></td> </tr> <tr> <td data-bbox="478 646 796 667">December 4, 2024</td> <td data-bbox="796 646 861 667">3:00pm</td> <td data-bbox="861 646 1016 667">25</td> <td data-bbox="1016 646 1237 667">24CV082728</td> </tr> </table>	<i>Hearing Date:</i>	<i>Time:</i>	<i>Dept/Div:</i>	<i>Case Number:</i>	December 4, 2024	3:00pm	25	24CV082728
<i>Hearing Date:</i>	<i>Time:</i>	<i>Dept/Div:</i>	<i>Case Number:</i>						
December 4, 2024	3:00pm	25	24CV082728						

1. *At the time of service I was at least 18 years of age and not a party to this action.*
2. *I served copies of the Summons; Complaint for Damages; Civil Case Cover Sheet; Notice of Case Management Conference; Notice of Case Assignment*
3. a. *Party served:* THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole  
 b. *Person served:* Koy Saechao, Client Representative, CSC Lawyers Incorporating Service, Registered Agent
4. *Address where the party was served:* 2710 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95833
5. *I served the party:*
  - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (*date*): Fri, Jul 12 2024 (2) at (*time*): 10:55 AM
    - (1)  (business)
    - (2)  (home)
    - (3)  (other) :
6. The "Notice to the Person Served" (on the summons) was completed as follows:
  - a.  as an individual defendant.
  - b.  as the person sued under the fictitious name of (*specify*):
  - c.  as occupant.
  - d.  On behalf of (*specify*): THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole under the following Code of Civil Procedure section:
 

<input checked="" type="checkbox"/> 416.10 (corporation)	<input type="checkbox"/> 415.95 (business organization, form unknown)
<input type="checkbox"/> 416.20 (defunct corporation)	<input type="checkbox"/> 416.60 (minor)
<input type="checkbox"/> 416.30 (joint stock company/association)	<input type="checkbox"/> 416.70 (ward or conservatee)
<input type="checkbox"/> 416.40 (association or partnership)	<input type="checkbox"/> 416.90 (authorized person)
<input type="checkbox"/> 416.50 (public entity)	<input type="checkbox"/> 415.46 (occupant)
<input type="checkbox"/> other:	



<i>Plaintiff:</i> JANE DOE <i>Defendant:</i> THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole, et al.	<i>Case Number:</i> 24CV082728
--	-----------------------------------

Recoverable cost Per CCP 1033.5(a)(4)(B)

**7. Person who served papers**

- a. Name: Nancy Graddy  
b. Address: FIRST LEGAL  
530 B Street, Suite 1050  
SAN DIEGO, CA 92101  
c. Telephone number: (619) 231-9111  
d. The fee for service was: \$96.60  
e. I am:  
(1)  not a registered California Process Server.  
(2)  exempt from registration under Business and Professions Code section 22350(b).  
(3)  a registered California process server:  
(i)  owner  employee  independent contractor  
(ii) Registration No: 04-010  
(iii) County: Placer

**8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.**

07/15/2024

(Date)

Nancy Graddy



# EXHIBIT G

<p><i>Attorney or Party without Attorney:</i>            Brett Schreiber, Esq. (SBN 239707)            SINGLETON SCHREIBER, LLP            591 Camino de la Reina, Suite 1025            San Diego, CA 92108            Telephone No: 619-356-7602</p> <p><i>Attorney For:</i> Plaintiff</p>		<p><i>For Court Use Only</i></p> <p><b>ELECTRONICALLY FILED</b>            Superior Court of California,            County of Alameda  <b>07/24/2024 at 09:19:23 AM</b>            By: Guadalupe Acevedo Zetina,            Deputy Clerk</p>	
<p><i>Insert name of Court, and Judicial District and Branch Court:</i>            ALAMEDA COUNTY SUPERIOR COURT</p>			
<p><i>Plaintiff:</i> JANE DOE  <i>Defendant:</i> THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole, et al.</p>			
<b>PROOF OF SERVICE SUMMONS</b>	<i>Hearing Date:</i> December 4, 2024	<i>Time:</i> 3:00pm	<i>Dept/Div:</i> 25
		<i>Case Number:</i> 24CV082728	

1. *At the time of service I was at least 18 years of age and not a party to this action.*
2. *I served copies of the Summons; Complaint for Damages; Civil Case Cover Sheet; Notice of Case Management Conference; Notice of Case Assignment*
3. a. *Party served:* CRAIG ALLEN HARWARD, an individual  
 b. *Person served:* CRAIG ALLEN HARWARD (Caucasian, Male, 50s, Brown Hair, 5'7", 180 Pounds)
4. *Address where the party was served:* 161 West 950 South, Apartment A4, Saint George, UT 84770
5. *I served the party:*
  - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (*date*): Sun, Jul 21 2024 (2) at (*time*): 07:50 PM
    - (1)  (business)
    - (2)  (home)
    - (3)  (other) :
6. The "Notice to the Person Served" (on the summons) was completed as follows:
  - a.  as an individual defendant.
  - b.  as the person sued under the fictitious name of (*specify*):
  - c.  as occupant.
  - d.  On behalf of (*specify*):
    - under the following Code of Civil Procedure section:
 

<input type="checkbox"/> 416.10 (corporation)	<input type="checkbox"/> 415.95 (business organization, form unknown)
<input type="checkbox"/> 416.20 (defunct corporation)	<input type="checkbox"/> 416.60 (minor)
<input type="checkbox"/> 416.30 (joint stock company/association)	<input type="checkbox"/> 416.70 (ward or conservatee)
<input type="checkbox"/> 416.40 (association or partnership)	<input type="checkbox"/> 416.90 (authorized person)
<input type="checkbox"/> 416.50 (public entity)	<input type="checkbox"/> 415.46 (occupant)
<input type="checkbox"/> other:	



<i>Plaintiff:</i> JANE DOE <i>Defendant:</i> THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole, et al.	<i>Case Number:</i> 24CV082728
--	-----------------------------------

Recoverable cost Per CCP 1033.5(a)(4)(B)

## 7. Person who served papers

- a. Name: Michael Currie  
b. Address: c/o FIRST LEGAL  
530 B Street, Suite 1050  
SAN DIEGO, CA 92101  
c. Telephone number: (619) 231-9111  
d. The fee for service was: \$486.60  
e. I am:  
(1)  not a registered California Process Server.  
(2)  exempt from registration under Business and Professions Code section 22350(b).  
(3)  a registered California process server:  
(i)  owner  employee  independent contractor  
(ii) Registration No:  
(iii) County:

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

July-23-2024

(Date)



Michael Currie



# EXHIBIT H

24CV082728 DOE vs THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, A UTAH CORPORATION

Civil Unlimited (Other Personal Injury/Property)

Rene C. Davidson Courthouse / DEPT 25 - HON. Jenna Whitman

Filed: 07/09/2024

Next Hearing: 12/04/2024 Initial Case Management Conference

Document Download

## Case Summary

Register of Actions

Participants

Future Hearings

Date	Message	Category	Download
07/09/2024	Complaint Filed by: Jane Doe (Plaintiff)  As to: THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole (Defendant); Craig Allen Harvard (Defendant)	Document	
07/09/2024	Summons on Complaint Issued and Filed by: Jane Doe (Plaintiff)  As to: THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole (Defendant); Craig Allen Harvard (Defendant)	Document	
07/09/2024	Civil Case Cover Sheet Filed by: Jane Doe (Plaintiff)  As to: THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole (Defendant); Craig Allen Harvard (Defendant)	Document	
07/09/2024	Notice of Case Management Conference Filed by: Clerk	Document	
07/09/2024	Notice of Case Assignment Filed by: Clerk	Document	
07/09/2024	Initial Case Management Conference scheduled for 12/04/2024 at 03:00 PM in Rene C. Davidson Courthouse at Department 25	Event	
07/09/2024	Case assigned to Hon. Jenna Whitman in Department 25 Rene C. Davidson Courthouse	Assignment	
07/16/2024	Proof of Personal Service Filed by: Jane Doe (Plaintiff)  As to: THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah Corporation sole (Defendant) Service Cost: 96.60 Service Date: 07/12/2024 Service Cost Waived: No	Document	
07/24/2024	Proof of Service of Summons Filed by: Jane Doe (Plaintiff)  As to: Craig Allen Harvard (Defendant)	Document	